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ABSTRACT

This document is intended to help existing school-to-work (STW) partnerships and the new local work force investment boards understand the opportunities for achieving common ground to better serve youth during implementation of the Workforce Investment Act (WIA) and formation of the new youth councils. The following are among the topics discussed: (1) the WIA's youth provisions (roles and responsibilities of youth councils; youth council membership requirements; activities and services; performance indicators; services for out-of-school youth; services for youth aged 18-21); (2) issues of mutual concern in the School-to-Work Opportunities Act (STWOA) and WIA youth provisions; (3) key issues for WIA youth implementation and potential support from the STWOA (defining youth-oriented work; building collaboration between youth councils and schools to improve the performance of WIA-eligible students; building year-round programs providing school year and summer activities; engaging employers and organized labor); (4) challenges to collaboration; and (5) early experiences connecting WIA youth and STW activities in selected sites (Sonoma County, California; Philadelphia, Pennsylvania; Brockton, Massachusetts; Manatee County, Florida; Waco, Texas). A 1999 memo titled "Guidance Regarding the Non-duplication Provision in the Workforce Investment Act" is appended, along with a core indicators crosswalk for selected provisions of pertinent federal legislation. (MN)

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"This paper was prepared to help both existing School-to-Work Partnerships and the new local Workforce Investment Boards to understand the opportunities for common ground to better serve youth during the implementation of the Workforce Investment Act and the formation of the new Youth Councils."

Download the cover memo (pdf file) from the NSTWO, U.S. Department of Education, and U.S. Department of Labor.
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SCHOOL TO WORK OPPORTUNITIES
U.S. DEPARTMENT OF EDUCATION U.S. DEPARTMENT OF LABOR

DEC 15 1999

MEMORANDUM FOR: State Workforce Directors
State School-to-Work Directors
State Directors of Vocational Education
State Directors of Adult Education

FROM: Raymond L. Bramucci, Assistant Secretary
Employment and Training Administration
Patricia W. McNeil, Assistant Secretary
Office of Vocational and Adult Education
Stephanie J. Powers, Director
National School-to-Work Office

SUBJECT: "WIA Youth Provisions and STWO: A Context for Collaboration"

We are pleased to share with you a paper developed for the National School-to-Work Office to help existing School-to-Work (STW) partnerships and new local Workforce Investment Boards better understand the opportunities available to serve youth in local communities as new Youth Councils are formed. The Departments of Education and Labor encourage you to make this paper available to your local Workforce Investment Boards, STW partnerships, and local education agencies as they implement Title I of the Workforce Investment Act (WIA).

The goals and purpose of the WIA/Title I youth provisions echo and in some cases expand upon those of the School-to-Work Opportunities Act of 1994, particularly in relation to promoting high academic achievement, building essential roles for employers and communities in the education of young people, and connecting youth to postsecondary education, training and careers. School-to-Work local partnerships are similar in their composition and responsibilities to the Youth Councils required under WIA.

As local Workforce Investment Boards establish Youth Councils, we believe this document can help communities consider how to build upon the experience of the School-to-Work local partnerships. The work they have accomplished can be useful. We encourage the WIBs to seek out this information and believe this document will provide suggestions on broad-based policies and priorities for services to all youth.

This is one of a number of tools the Departments of Education and Labor will be issuing over the next year to assist in the implementation of the Perkins III and the Workforce Investment Act.

Attachment

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WORKFORCE INVESTMENT ACT YOUTH PROVISIONS AND SCHOOL-TO-WORK OPPORTUNITIES: A CONTEXT FOR COLLABORATION

Executive Summary. This paper was prepared to help both existing School-to-Work Partnerships and the new local Workforce Investment Boards to understand the opportunities for common ground to better serve youth during the implementation of the Workforce Investment Act and the formation of the new Youth Councils. The federal Workforce Investment Act of 1998 (WIA) Title I contains significant new provisions that promote education, training and leadership development opportunities for low-income youth designed to help them transition successfully into adulthood and to participate actively in the nation's workforce. WIA youth programming incorporates effective youth development practices that provide for long-term, flexible interventions, and encourage the establishment of comprehensive community strategies to meet the needs of youth.

In many ways, the goals and purposes of WIA youth provisions echo and expand upon those of the School-to-Work Opportunities Act of 1994, particularly as they relate to promoting high academic achievement, building essential roles for employers and communities in the education of young people, and connecting youth to postsecondary education, training and employment with career potential. School-to-Work Local Partnerships, responsible for overseeing STW system building, are similar in their composition and responsibilities to the Youth Councils required under WIA, and in many instances, have a history of collaboration with JTPA Private Industry Councils. Furthermore, the three cornerstones of School-to-Work, i.e. school-based learning activities, work-based learning activities and connecting activities, form the youth programming elements required by WIA.

Therefore, as local Workforce Investment Boards establish Youth Councils and programs, it will be useful for them to be knowledgeable on the experience of School-to-Work Partnerships and the work they have accomplished. The existence and experience of youth serving entities such as local School-to-Work partnerships should be considered when localities develop their youth program to avoid duplication of efforts, maximize resources and better serve youth.

I. Overview. This paper describes youth-related provisions of the Workforce Investment Act contained in Title I of the Act. [*The Act has five Titles; Title I establishes the Workforce Investment System. It should be noted that Title II addresses Adult Education and Literary which also directs approximately 30% of its funding to programs serving youth.*] It emphasizes the opportunities the Act holds for establishing broad-based policies and priorities for youth within designated local workforce investment areas. Potential connections between Workforce Investment Board Youth Councils and School-to-Work Local Partnerships are raised, addressing both the opportunities for collaboration that exist, as well as the challenges to its realization. It concludes with brief

case studies of several communities where School-to-Work principles are beginning to inform and influence the creation of Youth Councils as well as the content of the local youth plan.

II. A Brief Summary of the Workforce Investment Act's Youth Provisions. Youth-related provisions of the Workforce Investment Act Title I call for states and their designated local workforce investment areas to enhance education and training opportunities for eligible youth so they are prepared for productive citizenship. These provisions insist on coordinated and collaborative efforts among key youth-serving entities within the local area, and promote a vision of unified policies and programs in support of youth in the local area.

WIA provides a broader range of activities than did its predecessor, the Job Training Partnership Act, and also promotes the use of longer-term interventions that are believed to be more effective in promoting self-sufficiency for low-income youth. Specifically, the Act promotes positive youth development strategies such as mentoring and leadership development, and focuses on academic achievement, high school completion and continuing education. Furthermore, WIA offers opportunities for communities to build a comprehensive local *system* to meet the needs of youth, and establishes Youth Councils, new governance structures that build and expand on existing local efforts and relationships, to help design and oversee this emerging system.

A. Roles and Responsibilities of Youth Councils. One of WIA's most important innovations is the establishment of Youth Councils. Created as subgroups of Local Boards, Youth Councils are to serve as advocates for area youth, and to ensure that quality workforce development activities are provided efficiently and effectively within the local area. The Youth Council may consider how existing youth programs and services are deployed. The Council could then be prepared to build on them with the goal of establishing a comprehensive set of services for all youth in the local area that meet their needs and connect them to the overall workforce investment system.

Specifically, Youth Councils are responsible for a set of important tasks, including:

- Coordinating youth activities in a local area;
- Developing portions of the local plan related to eligible youth, as determined by the chairperson of the Local Board;
- Recommending eligible youth service providers … subject to the approval of the Local Board;
- Conducting oversight with respect to eligible providers of youth activities subject to the approval of the local board; and
- Carrying out other duties, as authorized by the chairperson of the Local Board, such as establishing linkages with educational agencies and other youth entities.

As part of these operational tasks, Youth Councils will generally have policy responsibilities, including:

- Developing and recommending local youth employment and training policy and practice;
- Broadening the youth employment and training focus in the community to incorporate a youth development perspective;
- Establishing linkages with other organizations serving youth in the local area; and
- Taking into account a range of issues that can have an impact on the success of youth in the labor market.

Recognizing the Youth Council's expertise in youth policy and program areas, the Workforce Investment Board may delegate its responsibility to oversee youth activities.

B. Membership of the Youth Council. Because of its potential importance as a policy-making and oversight body, the Youth Council membership must include a number of key youth-oriented constituencies, including:

- Members of the WIA Board who have special interest or expertise in youth policy, e.g. educators, employers and representatives of human service agencies;
- Representatives of social service agencies, such a juvenile justice and local law enforcement agencies;
- Representatives of local public housing authorities;
- Parents of participating youth;
- Individuals with experience in youth activities, including former participants; and individuals representing organizations with such experience;
- Representatives of the Job Corps, if a Job Corps Center is in the local area; and
- Other individuals deemed appropriate by the Board Chair and the chief elected official(s) in the local area.

C. Activities and Services. WIA Youth programs are no longer separated into summer and year-round programs. Therefore, Youth Councils are expected to design integrated approaches that provide continuing support for participating youth throughout the year. In developing the youth portion of the local workforce investment plan, the Youth Council must establish a design framework that provides: (1) objective assessments of academic and occupational skill levels and service needs for participating youth; (2) individual

service strategies that reflect the assessment and identify a career goal; and (3) preparation for postsecondary educational opportunities, preparation for employment, linkages between academic and occupational learning, and connections to employers and job markets.

The Youth Council must also ensure that each of ten statutorily identified program elements is available to participating youth within the local area. The ten elements are incorporated within the three cornerstones of School-to-Work, i.e. school-based learning, work-based learning, and connecting activities. These ten elements are:

- Tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies;
- Alternative secondary school offerings;
- Summer employment opportunities directly linked to academic and occupational learning;
- Paid and unpaid work experiences, including internships and job shadowing,
- Occupational skill training;
- Leadership development opportunities, which may include such activities as positive social behavior and soft skills, decision making, team work, and other activities;
- Supportive services;
- Adult mentoring for a duration of at least twelve months, that may occur both during and after program participation;
- Follow-up services for at least twelve months;
- Comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the youth.

Local programs have the discretion to determine what specific program services will be provided to a youth participant, based on each participant's objective assessment and individual service strategy. In addition to these program elements, Youth Councils must also develop links with key local youth programs and providers so that eligible youth may be referred for needed services.

D. Performance Indicators. WIA establishes two sets of performance indicators with which local Boards are to measure and promote continuous improvement of the local area in providing services.

Performance indicators for 14-18 year-olds are:

- Attainment of basic skills, and, as appropriate, work readiness or occupational skills;
- Attainment of a secondary school diploma or recognized equivalent; and
- Placement and retention in postsecondary education or advanced training, or placement in military service, employment or qualified apprenticeships.

For older youth, 19-21 years-of-age, the performance indicators are similar to those for individuals served by the adult and dislocated worker funding streams, i.e. (1) entry into unsubsidized employment; (2) retention in unsubsidized employment six months after entry; (3) earnings received in unsubsidized employment six months after entry; and (4) attainment of recognized credentials relating to achievement of education or occupational skills. Regardless of age, the Act also has a requirement for "customer service" as a performance indicator. [The core performance indicators for youth 14-18 and 19-21 under WIA are displayed in an attached chart showing their comparability with WIA Adult programs, Adult Education (Title II) and Perkins Vocational Education.]

E. Services for Out-of-School Youth. WIA requires that at least 30% of youth funds support activities for out-of-school youth, defined as eligible 14-21 year-olds who are high school dropouts, or who have a secondary school diploma or equivalent but are deficient in basic skills, are unemployed or underemployed. Youth enrolled in an alternative education program at the time of registration are not considered to be out-of-school. However, if youth are out-of-school at the time of their registration for WIA, they may subsequently be served in an alternative school.

F. Services for Youth 18-21. Eighteen to twenty-one year-old eligible youth may be served as youth, adults, or concurrently enrolled in both programs, consistent with eligibility criteria and individual assessments. Local Boards and Youth Councils will establish their own criteria for determining the appropriate service mix for youth in this age bracket. Such individuals may also be served through the dislocated worker program if they meet the eligibility requirements.

III. The School-to-Work Opportunities Act and WIA Youth Provisions: Addressing Issues of Mutual Concern.

The School-to-Work Opportunities Act of 1994 (STWOA) sought to establish a national framework within which states could create a statewide system of school-to-work transition. STWOA authorized a seven-year system-building effort to enhance students' academic achievement, career awareness and readiness for postsecondary education, training and employment. Keys to this system-building were a network of local school-to-work partnerships in all states, representing key public, private and community constituencies, including students and parents, that would organize and oversee the roll-out of locally-derived and delivered school-to-work systems. Guided by state plans, and with funding for implementation from the federal government, local partnerships were to devise approaches that were informed by STW's three pillars: school-based learning activities, workplace learning activities, and connecting activities.

To a considerable extent, this effort has been successful. Hundreds of School-to-Work partnerships have, in fact, worked collaboratively to create new opportunities for youth to understand the essential connections between school and career success, and to apply and extend their knowledge in real-world contexts. Employers and unions are playing key roles in local partnerships, not only by providing work-based learning opportunities, but

also by participating in curriculum development and sponsoring professional training opportunities for teachers. Parents and students, too, are invaluable members of local partnerships, helping to maintain a clear focus on the needs of students.

The great diversity and wealth of experience within local school-to-work partnerships makes them ideal resources for WIA Boards and Youth Councils. Since the advent of STWOA, local STW partnerships have faced and overcome a wide variety of system-building challenges, and have identified a range of effective practices that support and promote career development for youth. As a result, many STW partnerships have created strong foundations on which broad-based and community-driven education and training strategies can be built.

IV. Key Issues for WIA Youth Implementation and potential support from STWOA.

The consistency between STWOA and WIA youth provisions suggests that the school-to-work experience at local and regional levels is a potentially valuable resource for local Boards and Youth Councils as they begin to develop their systems. Of course, in many states and localities, strong ties already exist between STW partnerships and JTPA Private Industry Councils. WIA's new emphases on academic achievement and youth development suggest that these ties will be more important than ever for both systems.

In particular, STW partnerships may offer valuable lessons for Workforce Investment Boards and Youth Councils as they address a number of key issues.

A. How will the local Board and the Youth Council define their youth-oriented work?
First and foremost, local Boards and Youth Councils must determine the scope of their youth-oriented programs and activities. WIA presents local Board with two decidedly different options for building their Youth Councils. On the one hand, they may follow a narrow path, establishing a Youth Council to design policies and oversee programs for WIA-eligible youth and funding only. On the other, they may choose to take a more expansive approach, engaging other major public and private youth-related programs and funding partners in ways that can create a broader and more comprehensive system for youth within the local area.

STW partnerships can be an important resource to WIA Boards and Youth Councils as they address the scope and vision of their work. Because STW partnerships have been committed to building systems for all youth, many will have experience in creating and overseeing programs that serve low-income youth in the context of a broader system. The successes or failures of these efforts will provide important information for local Boards and Youth Councils that can help to determine whether a broader or more narrow view of their work is more appropriate, how to stage their efforts and how best to ensure successful outcomes for eligible youth.

B. Who should sit on the Youth Council? The answer to this question depends to a considerable extent on how Youth Councils define the scope of their work. As noted earlier, WIA requires that Youth Council membership include certain specified representatives. The chair of the local Board and the chief elected official, may however significantly augment this list to reflect a broader and more comprehensive mission.

In most instances, School-to-Work partnerships will already include many of the required and other desirable members of the Youth Council. For example, by law, STW Local Partnerships include representatives of employers, schools, unions, youth, parents and other key youth-oriented entities. Furthermore, STW partnerships exist in most local workforce investment areas, and have been engaged in serving youth for the past 3-5 years. As a result, many local Partnerships are mature organizations that have begun the hard work of system building, and have become effective vehicles for connecting schools and employers to meet their mutual goals and objectives. Thus, School-to-Work partnerships could form the core of Youth Councils, or at least could be the source of representatives from several key constituencies. Other existing local entities should also factor into youth council designation discussions. For example, existing youth subcommittees of local boards under JTPA, or existing advisory groups or local task forces to Empowerment Zones or Enterprise Communities funded by the Department of Housing and Urban Development are existing entities that should not be overlooked as local youth councils are formed.

C. How does the Youth Council work with the schools to represent and to serve the best interests of WIA-eligible youth? In particular, how can the Youth Council work with schools to improve the performance of WIA-eligible students? Without question, local Boards and Youth Councils must work closely with educational agencies in the school district(s) and individual schools to be able to ensure effective delivery of required program elements and to define and build appropriate accountability strategies consistent with WIA's performance indicators. In some instances these relationships may exist, and in others they may not. Even where good relationships exist, most Youth Councils will encompass geographic areas that serve many separate school systems. Forging and maintaining working relationships with multiple school districts has the potential to make these essential connections both more rewarding and challenging.

Given the nature of their work, STW partnerships have developed extensive ties to local school administrators and teachers. Like local WIA Boards and Youth Councils, STW partnerships often incorporate and represent multiple school jurisdictions. Therefore, local partnerships are likely to have useful experience to share with Boards and Youth Councils that can help them find ways to work with a wide range of schools and school systems. Furthermore, many STW partnerships will have experience in working with school systems to design and build strategies to meet local and state accountability requirements (e.g. academic standards).

Finally, STW partnerships will have knowledge of other education-related funding streams that are currently providing services to WIA-eligible youth, on which Youth Councils can build. For example, local partnerships are likely to include school

personnel who understand an array of educational programs and funds, such as Carl D. Perkins Applied Technology Education Act, Title I of the Elementary and Secondary Education Act, STWOA, Drug Free Schools and Communities Act, the Adult Education Act, and others that have the potential to complement WIA funds, the participating partners in one-stop centers, and enhance the performance of WIA-eligible youth. .

D. How does the Youth Council build a year-round program that includes both school year and summer activities? Since WIA erases the lines between summer and year-round programs, local Boards and Youth Councils have the flexibility to design ongoing activities and support systems for youth. Also, WIA core performance indicators apply to all participating youth, whether in summer or year-round components. Furthermore, the WIA-Interim Final Regulations state that summer employment opportunities are not to be "stand-alone" programs, and that they must include direct linkages between academic and occupational learning. In short, the integrated WIA youth program insists on solid programming throughout the year that focuses on enhancing basic skills and, as appropriate, work readiness and occupational competencies.

The consistency of purpose and requirements between WIA and STWOA means that STW partnerships may already have addressed and overcome the challenges of year-round programming. For example, three important purposes of the STWOA are:

- To help all students attain high academic and occupational standards;

- To improve the knowledge and skills of youths by integrating academic and occupational learning, integrating school-based and work-based learning, and building effective linkages between secondary and postsecondary education;

- To motivate all youths, including low-achieving youths, school dropouts, and youths with disabilities, to stay in or return to school or a classroom setting and strive to succeed, by providing enriched learning experiences and assistance in obtaining good jobs and continuing their education in postsecondary educational institutions.

STW activities associated with these purposes are likely to have year-round components that connect youth with opportunities to enhance both academic and occupational skills, and that address many of WIA's required program elements. In fact, as referenced earlier, much of the School-to-Work framework of school-based learning activities, work-based learning activities and connecting activities, has been incorporated into WIA's ten required program elements.

For example, WIA elements such as tutoring, alternative education services, and dropout prevention strategies are consistent with school-based learning activities, while summer employment opportunities, occupational skills training, and work experience clearly relate to work-based learning. And required elements such as leadership development, supportive services, adult mentoring, follow-up services, and comprehensive guidance and counseling are consistent with programs and services provided through STW connecting activities.

Thus, as WIA Boards and Youth Councils look to build year-round programming, the proven programs and services supported through STW partnerships are resources for effective practice.

E. How does the Youth Council engage employers and organized labor? Employers are no strangers to the youth employment and training efforts, since private sector representatives comprised a majority of JTPA's Private Industry Councils, and a significant part of State Job Training Coordinating Councils. Union representatives, too, were required members of PICs and SJTCCs. WIA provisions go farther, encouraging direct participation of private sector representatives in the development of youth policies and programs within the local workforce development plan. Therefore, local Boards and Youth Councils are clearly encouraged to find ways to engage employers and organized labor, and provide opportunities into the menu of youth activities and programs within the local workforce investment area.

From the outset, employers and unions have been essential partners in STW partnerships. They have been instrumental in identifying opportunities for work-based learning, internships and mentoring for participating students. They are also quick to understand the value of the workplace as a learning place, and to grasp the importance of integrating academic and occupational skills training. Building on employer and union members of local partnerships also helps to minimize duplication of effort and make the best use of their valuable time.

At the national level, business organizations such as the National Alliance of Business and the National Employer Leadership Council (NELC) have urged employers to become actively involved in local STW partnerships. In fact, NELC produced an Employer Participation Model, describing key areas in which employers could help to build School-to-Work systems. These broad categories include working with students to provide career information, partnering with teachers to improve student performance, working with policy makers and others to create workforce development systems, and strengthening employer commitment to quality education.

For all of these reasons, STW partnerships are an obvious place to seek committed and experienced employer and union partners for the Youth Council.

F. How will the Youth Council develop out-of-school youth programming? Local WIA Boards and Youth Councils must spend at least 30% of their youth funding on out-of-school youth. How will these efforts be structured in relation to school-based youth programming? What criteria will local Boards and Youth Councils use to determine whether 18-21 year-olds are served as youth or adults, or both? And most importantly, whether they are served through the youth or the adult system, how can WIA Boards and Youth Councils develop their efforts in ways that enhance the likelihood that WIA programs will, in fact, support the journey of participating out-of-school youth toward self-sufficiency?

Funds under the School-to-Work Opportunities Act are designed to serve students -- in-school as well as out-of-school. One purpose is to motivate "low-achieving youths" and "dropouts" to stay in school or to return for additional education. Other specific STWOA activities relating to the needs of disadvantaged out-of-school youth include:

- Integrating school-based and work-based learning into job training programs that are for school dropouts;

- Establishing, in schools participating in the School-to-Work Opportunities program, a graduation assistance program to assist at-risk students, low-achieving students, and students with disabilities, in graduating from high school, enrolling in postsecondary education or training, and finding or advancing in jobs; and

- Obtaining the assistance of organizations and institutions that have a history of success in working with school dropouts and at-risk and disadvantaged youths in recruiting the participation of such school dropouts and youths.

Given these emphases, some STW Partnerships are likely to possess at least some knowledge and experience concerning services to out-of-school and at-risk youth, as well as other students.

Realistically, however, programming for out-of-school youth has not been an area of strength for a great number of STW partnerships. Thus, in this instance, local partnerships will also benefit from working closely with local Boards and Youth Councils to address the challenges of providing services to out-of-school youth.

G. What are the appropriate connections between WIA Youth programming and One-Stop Career Centers?

The WIA youth program is a mandated one-stop partner. As a one-stop partner, youth programs must contribute to the creation and maintenance of the One-Stop Delivery System and provide the core services that are applicable to the partner's programs.

It seems reasonable that older credentialed youth who are primarily focused on employment could be served as adults through the One-Stop system. What types of activities might the One-Stop provide for youth from 14-18 and for out-of-school youth with educational deficits?

Once again, STW partnerships are well positioned to help local Boards and Youth Councils answer these questions. In many instances, STW partnerships are already working with One-Stop Centers to establish linkages for students and out-of-school youth so they can access information on careers and related skills, local labor market needs, connections to employers, and opportunities for additional training. STW partnerships can also play important roles in working with schools to arrange tours of the One-Stop Center, to provide schools with access to Labor Market Information (LMI) products and to help organize youth-oriented areas and services available there. Some One-Stops are

setting youth resource rooms within their One-Stops or are implementing a youth component within the One-Stop.

H. How will the Youth Council provide support, follow-up and referral services for participating youth? Research has demonstrated the positive effects of ongoing support for young people while they are in school or other education and training offerings, and after they have left a formal training program. Therefore, one of the most welcome aspects of WIA are the opportunities to provide support and referral services for youth, and its requirement that follow-up services be provided to participants for at least 12 months. This is also a demanding task as the challenges of long-term follow-up are well documented, as are the difficulties of keeping participants connected to a program once formal activities have concluded.

WIA's requirements that participating youth have access to support, referral and follow-up services are prefigured in STWOA's connecting activities components. For example, STW components may include:

- Providing supplementary and support services, including child care and transportation, when such services are necessary for participation in a local School-to-Work Opportunities program; and

- Linking the participants with other community services that may be necessary to assure a successful transition from school to work;

Because of these requirements, many STW partnerships may already have established relationships with service providers and identified systematic approaches that either directly provide or refer and connect youth to needed services. In particular, because STW partnerships span multiple jurisdictions, their experience in providing these services across geographic and programmatic boundaries can be extremely useful to Youth Councils as they address similar challenges.

STWOA also encourages follow-up services for participating youth, including:

- Providing assistance to participants who have completed the program in finding an appropriate job, continuing their education, or entering into additional training;

- Collecting and analyzing information regarding post-program outcomes of STWOA participants, including those for dropouts and disadvantaged students; and

- Linking STWOA youth development activities with employer strategies for upgrading the skills of their workers.

Therefore, STW Partnerships may have developed techniques and/or strategies in which Youth Councils can build follow-up approaches. One-Stop Centers are also expected to be a significant resource in providing follow-up services for participating youth and can support the work of both Youth Councils and STW partnerships.

V. Challenges to Collaboration. Opportunities for and value of collaboration between the local Workforce Investment Boards, Youth Councils and local partnerships created under the School-to-Work Opportunities Act were discussed in Sections III and IV of this paper. Nevertheless, some connections may seem, at first, more difficult. For example, a number of state setasides under JTPA, e.g., the State Education and Coordination Grant [8% funds] were eliminated in order to provide States with increased flexibility in the use of funds. However, the loss of these dedicated funds may result in a challenge for communities as this they seek to continue collaboration between schools and youth development efforts. Furthermore, JTPA income eligibility proxies like the Free Lunch program and Title I Schoolwide status that eased the paperwork and documentation burdens on potential participants was not included in WIA. Beyond these statutory changes, establishing collaboration based on common goals, knowledge, openness to change and mutual respect is likely to take time and significant effort.

There is no ignoring the challenges these issues present. The eligibility proxy issue can be resolved through the legislative amendment process, if Congress chooses to do so. Additional resources, e.g., Perkins, Adult Education and Wagner-Peyser, may be available through One-Stop Centers to serve youth needing services. However, the fundamental issues of collaborative governance and funding, which are in large measure matters of trust, may only be resolved over time through positive experiences associated with joint planning and decision-making, and agreeing on roles for all key partners that honor statutory responsibilities.

Other challenges to collaboration have been raised, and can be more readily addressed. For example:

A. ***WIA's Nonduplication of School-to-Work Activity Provisions.*** Much has been made of language within the Workforce Investment Act that restricts the use of WIA funds in support of school-to-work programs. [A joint guidance letter from the Assistant Secretary for Vocational & Adult Education; the Assistant Secretary for Special Education and Rehabilitative Services; and the Assistant Secretary of the Employment and Training Administration to State Directors of Adult Education, State of Vocational Education,. State School-to-Work Directors. State Directors of Vocational Rehabilitation, and State Workforce Directors addressed this issue and is attached to this paper as an appendix.] The pertinent language, found in Section 129 (c)(6)(B), reads:

"All of the funds made available under this Act shall be used in accordance with the requirements of the Act. None of the funds made available under this Act may be used to provide funding under the School-to-Work Opportunities Act of 1994 (20 U.S.C. 6101 et. seq.), or to carry out through programs funded under this Act, activities that were funded under the School-to-Work Opportunities Act of 1994, ***unless (emphasis added)*** *the programs funded under this Act serve only those participants eligible to participate in the programs under this Act.*

Thus, the Act restricts the use of WIA youth funds for STW activities unless the activities are authorized under WIA and the programs serve WIA-eligible youth. Stated in the affirmative, it is clear that WIA funds can support WIA authorized STW activities for WIA eligible youth. Furthermore, as we have seen, the purposes, activities and requirements of STWOA are entirely consistent with those of WIA youth provisions. Regardless of how they are termed, WIA youth activities are, for the most part, found in School-to-Work activities, programs and systems. Therefore, when the activity is allowable and the youth is eligible under WIA, the local Boards and Youth Council may coordinate, consult and cooperate with the STW partnership.

B. WIA's focus on low-income youth vs. STWOA's "all students." There is no denying that WIA youth funds are specifically directed to low-income students (although 5% of the funds can be used for individuals who are not low-income). Yet, this does not mean that STW programs cannot collaborate with and inform WIA youth programs. In fact, connecting WIA-eligible youth to broader workforce and economic development systems, rather than placing them in separate programs isolated from the mainstream is expected to part of WIA youth programming. Furthermore, it is clear that Youth Councils, with their responsibilities to coordinate "youth programs throughout the local area" and to ensure that the needs of youth are addressed within the overall workforce investment system, have the potential to develop area-wide priorities and plans that not only drive WIA youth dollars, but that also help to influence other youth programming and funding streams in ways that serve the needs of all youth.

C. ***Connecting STW with WIA youth programming will cause problems for employers participating in STW, since they will be less enthusiastic about WIA's specific focus on low-income youth.*** An optimal economy depends on all youth having the academic and occupational skills to successfully participate in the labor market. Well conceived and executed youth programs show, with proper instruction and screening, low-income youth, even those who have skill deficiencies and limited work histories, can become highly productive in work-based learning settings. Furthermore, as they participate in work-based learning activities, research suggests that youths' academic skills are likely to improve, as are their attitudes about schooling and its relationship to career success. As these successes are recognized, employer partners benefit from knowing they have made a real difference in the lives of participating youth, as well as from the public recognition of their efforts to support the community and its young people.

D. The geographic boundaries of School-to-Work Partnerships are not necessarily consistent with those of WIA Boards and Youth Councils. STW partnerships often incorporate multiple school districts and other youth-related service delivery systems. For this reason, local Boards and Youth Councils are urged to consider strategies identified by STW partnerships designed to build productive relationships with various institutions under these circumstances. However, it is also true that more than one local partnership might exist within each WIA workforce investment area (or vice versa), giving rise to similar questions around coordination and representation. Fortunately, a number of states established common geographic boundaries for the two systems.(e.g.

Maryland, Michigan, New Jersey, Alabama). Other states have regional structures that promote coordination between and among regional STW partnerships. In these instances, it should be relatively easy for local Boards and Youth Councils to identify effective youth programs and practices within the region, and also to tap key local STW partnership leaders to serve on and/or to lead the Youth Council. In cases where such regional structures do not exist, each state's Workforce Investment Board can help to convene regional forums where strategies for connecting the two systems can be explored and determined.

VI. Reports from the Field -- Early Experiences in Connecting WIA Youth and STW Activities

Although the WIA delivery system is not required to be in place until July 1, 2000, a few workforce investment areas are formally establishing WIA Youth Councils and seriously exploring potential connections between WIA Youth and STW activities. The early experiences of these pioneers are likely to inform and influence the work of hundreds of other areas in the months to come. The following summaries of five areas' experiences to date in building WIA-STW connections provide snapshots of this early work.

Sonoma County Private Industry Council. The Private Industry Council and the School-to-Work Local Partnership currently operate JTPA and STWOA, respectively, in Sonoma County. While both entities have strong interests in youth development and each other's activities, historically they have operated as independent organizations. However, with the advent of WIA and the need to establish a Youth Council, new opportunities for collaboration now exist. Preliminary plans call for the Youth Council to be formed from the memberships of the Workforce Investment Board and the Local STW Partnership, plus the addition of any other mandated partners that do not currently serve on either board. In this way, the Youth Council, which will be known as the Youth Education and Employment System, will be responsible to both the Workforce Investment Board and also to the local School-to-Work Partnership. Thus, principles of School-to-Work will not only continue to be espoused through the local STW Partnership, but also have the potential to inform and influence WIA youth policies and programming, as well. In return, the Youth Council will have a perspective of a range of youth programs, not just those serving WIA-eligible youth.

Philadelphia. Philadelphia's nationally recognized School-to-Career system is already having a strong, positive impact on the developing shape and substance of the City's WIA youth activities. For example, the Philadelphia School-to-Career Leadership Council (the STW local partnership) is being transformed, with appropriate augmentations, into the Philadelphia Youth Council. Furthermore, the Executive Director of the School District of Philadelphia's Office of Education for Employment (the administering entity for school-to-work) has also been tapped to head the new nonprofit organization that will be responsible for development and implementation of WIA youth programming in the City.

For several years the Philadelphia School-to-Career system has incorporated many of the principles now included as part of WIA's required activities for youth. For example, leadership development opportunities such service learning and adult mentoring have been essential components of Philadelphia's approach. There are also a strong emphases on mastery of high academic standards and preparation for postsecondary education and training.

Philadelphia's STC system has promoted community involvement and empowerment, prefiguring WIA's emphases, through the establishment of a network of community resource boards that work with neighborhood schools to identify problems. These community boards have developed solutions and have identified resources, to address problems. Philadelphia's STC work-based learning efforts have been coordinated with the PIC's JTPA summer youth programs. During the 1999 summer program, direct links were created between academic and occupational learning in the form of project based instruction.

Employers, too, have supported the School-to-Career system by providing work-based learning slots for youth, and also by serving on Employer Stakeholder Partnerships. These partnerships are organized around growth sectors of the Philadelphia economy. They develop curricula and help to oversee career components of School-to-Career small learning communities.

In short, Philadelphia's schools, employers, postsecondary education institutions, and community organizations are actively involved in the School-to-Career system. As a result, the Workforce Investment Board and Youth Council will look to its principles and effective practices as the new WIA Youth Council and related activities are formulated and put into place.

Brockton, Massachusetts. School-to-Work principles and practice are informing the development of WIA youth programming in the workforce investment region serving Brockton, Massachusetts and 10 other nearby municipalities in a variety of ways. The STW local partnership has worked closely with the regional Private Industry Council on a number of youth-oriented activities, and this solid relationship is expected to carry through to the implementation of WIA. In fact, the Chair of the Board of the PIC heads a private non-profit organization that is in its third year of funding from a STW Urban/Rural Opportunities Grant. The UROG grant has enabled Brockton to establish a charter school for out-of-school youth that is based on school-to-work principles and programs. It has also made it possible for the organization to operate school-to-work programs for thousands of in- and out-of-school youth in Brockton, in close cooperation with the STW local partnership, thus allowing formula STW funds to flow to other communities.

Even though Massachusetts is not an early WIA implementer, Brockton is moving forward to develop its implementation strategies. The PIC Chair, who heads the Brockton school-to-work UROG Grant, has been appointed by the Mayor of

Brockton to head up a Transition Committee that is to advise him on a variety of WIA-related issues. She will provide recommendations concerning structure and membership of the Youth Council, and youth-related programs and services that should be offered with WIA funds.

Suncoast Regional Youth Council. The Suncoast Regional Youth Council (SRYC) serves a 40-mile-long workforce investment area on the western Florida Coast that includes Sarasota and the balance of Manatee County. SRYC was formed when the regional Workforce Development Board asked the School-to-Work Consortium (the Local Partnership) to take on the role of Youth Council under WIA. This request was not unexpected, since the local partnership already managed both School-to-Work and Tech Prep efforts, and worked closely with the area community college and school districts. As a result, the Workforce Development Board relied heavily on the Local Partnership for advice and programmatic direction on variety youth activities. Furthermore, the chair of the local partnership was an active member of the Board, and the Regional Administrator of the local partnership served as an ad-hoc member of the Executive Committee.

Because Florida is an early implementing WIA state, SRYC is moving quickly to identify strategies to address its new responsibilities. The first challenge will be to define and design a strategy for year-round programming. Summer programming is expected to become an integrated part of year-round efforts. School-based efforts will initially focus on dropout prevention. Another major effort will be to find ways to recruit out-of-school youth into appropriate academic and occupational programming.

To assist in fleshing out youth priorities, SRYC convened a community youth forum of major youth providers in the workforce investment area. At this event, providers were asked to identify the most effective programs and services for at-risk and disadvantaged youth, as well as strategies for recruiting the neediest out-of-school youth. This forum began a dialogue that is helping to promote cross-agency service provision, sharing best practice strategies and focusing the community on needed services for youth. The products from this forum were also used to frame the content of WIA youth RFPs.

Heart of Texas Workforce Development Board. The Heart of Texas Workforce Development Board administers WIA and STWOA funds for a six-county region, including Waco. The STW Local Partnership exists as a subcommittee of the Workforce Investment Board, and almost one-third of the Local Partnership's members also serve on the Board. Shared staff supports both entities.

During the two years in which STWOA funds have been available to the Board, STW principles have informed JTPA youth programming. That is, programs supported by JTPA Titles IIB (summer youth), IIC (year-round youth) and the Section 123 state education coordination grant [also known as the 8% funds] must incorporate STW school-based and work-based learning activities. They must also promote the mastery of basic skills competencies, such as those embodied in Secretary Commission's on

Achieving Necessary Skills (SCANS). Thus, a solid foundation for collaboration between STW and WIA youth programming already exists.

Given the strong, positive relationship between the Workforce Development Board and the local STW partnership, and the extent to which School-to-Work principles have informed JTPA youth programming, the Board recently voted to build the WIA Youth Council on the membership of the Local Partnership. Several constituencies must be added to the Partnership, and, once these nominations are finalized, the Board will formally appoint and establish the Youth Council.

Although the youth portion of the local plan has yet to be developed, it is expected to continue the STW emphases on work-based learning and readiness for postsecondary education. The precise nature of youth connections to the One-Stop Center has yet to be determined, as have specific strategies to address the needs of out-of-school youth.

Conclusion: The Departments of Education and Labor and the National School-to-Work Office hope this paper will help communities consider the opportunities that are to be gained from collaboration between existing School-to-Work partnerships and the newly formed Workforce Investment Boards and Youth Councils. We believe there is much to gained by school systems, employers, and the workforce/youth development systems sharing information and experiences and deliberating strategies to better serve youth as they move through their education and prepare for their futures. Such entities as schools, employers and youth development organizations have much to contribute and much to learn from each other.

Attachments:

1) Memo dated June 30, 1999 on "Guidance Regarding the Non-duplication Provision in the Workforce Investment Act"
2) Core Indicators Cross-Walk for: WIA Title I Adult; WIA Title I-Youth 19-21; WIA Title I Youth 14-18; WIA Title II Adult Education; and Perkins Voc Education

U.S. DEPARTMENT OF LABOR
U.S. DEPARTMENT OF EDUCATION

JUN 30 1999

MEMORANDUM FOR: State Directors of Adult Education
State Directors of Vocational Education
State School-to-Work Directors
State Directors of Vocational Rehabilitation
State Workforce Directors

FROM: RAYMOND L. BRAMUCCI, Assistant Secretary
Employment and Training Administration
JUDITH E. HEUMANN, Assistant Secretary
Special Education and Rehabilitative Services
PATRICIA W. McNEIL, Assistant Secretary
Vocational & Adult Education

SUBJECT: Guidance Regarding the Non-duplication Provision in the Workforce Investment Act [Pub.L. 105-220; section 129(c)(6)(B)] and the Limitation Provision in the Carl D. Perkins Vocational and Applied Technology Amendments Act [Pub. L. 105-332; section 6]

This is the second in what we hope to be a series of joint communications regarding cross-cutting issues pertaining to the implementation of the Workforce Investment Act (WIA). The first communication, which was issued on December 17, 1998, outlined the coordination efforts being undertaken by the Departments of Labor and Education to make it easier to implement WIA's reforms at the State and local level.

The purpose of this memorandum is to provide guidance regarding the relationship between WIA, which includes the Adult Education Act; the new Perkins Act (Perkins III); and the School-to-Work Opportunities Act (STW). WIA and Perkins III contain corresponding provisions addressing this relationship.

These provisions require that funds be used in accordance with the requirements of each Act. This type of provision is common in a variety of Federal statutes.

These provisions say that none of the funds provided under each of these Acts, "may be used to provide funding under the School-to-Work Act, or to carry out, through programs funded under this Act, activities under STW, unless the programs funded serve only participants eligible to participate in the programs under [WIA

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or Perkins III respectively]." This means that funds must be expended on activities that are authorized by these Acts to serve individuals who are otherwise eligible under such Acts. Thus, WIA funds may not be transferred to STW to operate programs, may not be used to provide services that are not authorized under WIA, and may not be used to serve individuals who are not eligible to participate under WIA.

The same is true with respect to the use of funds under Perkins III. An activity funded under Perkins III must meet all other applicable requirements, including the supplanting prohibition in section 311(a) of Perkins III.

Thus, the programs authorized under Perkins III or WIA may collaborate with programs operated under STW, provided that the limitations listed above are observed. If the activity is allowable and the participant [in the case of workforce programs] is eligible, State or local administrative or policy bodies may coordinate, consult, and cooperate among WIA, Perkins III, and STW programs.

These requirements do not limit activities that may be carried out for participants under WIA or Perkins III. The Departments of Education and Labor do not foresee that these provisions will create barriers to successful collaboration between STW and workforce investment, vocational education, vocational rehabilitation, or adult education activities. Assuming that you currently satisfy the above conditions, these provisions would not require you to do anything in the future differently than you are doing now.

WIA and Perkins III became law on the date of enactment, however, they do not affect appropriations until program year 1999, which begins July 1, 1999. (Note: The job training provisions of WIA only take effect when a State implements such provisions -- which may not be until July 1, 2000.) Thus, these Acts do not make any immediate changes in the use of School-to-Work, Job Training Partnership Act, Adult Education, Vocational Education, or Vocational Rehabilitation funds prior to implementation.

Please contact the Office of Vocational and Adult Education or the Office of Special Education and Rehabilitative Services in the Department of Education; the Employment and Training Administration in the Department of Labor; or the National School-to-Work Opportunities Office, with any specific questions that you may have.

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CORE INDICATORS CROSS-WALK

Prepared by Office of Vocational and Adult Education

Performance Indicator	*WIA Title I Adult Ages 21+*	*WIA Title I Youth Ages 19-21*	*WIA Title I Youth Ages 14-18*	*WIA Title II – Adult Education*	*Perkins Voc Ed*
Placement in Employment	Entry into unsubsidized employment	Entry into unsubsidized employment	Placement in employment	**Placement in unbsubsidized employment**	**Placement in employment**
Retention in Employment	**Retention in unsubsidized employment 6 months after entry into employment**	Retention in unsubsidized employment 6 months after entry into employment	Retention in employment	**Retention in unsubsidized employment or career advancement**	**Retention in employment**
Earnings	**Earnings received in unsubsidized employment 6 months after entry into the employment**	Earnings received in unsubsidized employment 6 months after entry into the employment			
Secondary school diploma or equivalent	**Attainment of a recognized credential relating to achievement of a secondary school diploma or its recognized equivalent...by participants who enter unsubsidized employment**	Attainment of a recognized credential relating to achievement of a secondary school diploma or its recognized equivalent...by participants who enter postsecondary education, advanced training, or unsubsidized	Attainment of secondary school diplomas and their recognized equivalents	**Receipt of a secondary school diploma or its recognized equivalent**	**Student attainment of a secondary school diploma or its recognized equivalent**

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Performance Indicator	*WIA Title I Adult Ages 21+*	*WIA Title I Youth Ages 19-21*	*WIA Title I Youth Ages 14-18*	*WIA Title II – Adult Education*	*Perkins Voc Ed*
		employment			
Occupational Skill Attainment	Attainment of occupational skills by participants who enter unsubsidized employment	Attainment of occupational skills by participants who enter postsecondary education, advanced training, or unsubsidized employment	Attainment, as appropriate, of work readiness or occupational skills		Student attainment of challenging State established vocational and technical skill proficiences; student attainment of a proficiency credential in conjunction with a secondary school diploma
Academic Skills Attainment					Student attainment of challenging State established academic proficiencies
Basic Skills Attainment			Attainment of basic skills	Demonstrated improvements in literacy skill levels in reading, writing, and speaking the English language, numeracy, problem solving, English language acquisition, and other literacy skills	

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Performance Indicator	*WIA Title I Adult Ages 21+*	*WIA Title I Youth Ages 19-21*	*WIA Title I Youth Ages 14-18*	*WIA Title II – Adult Education*	*Perkins Voc Ed*
Postsecondary Education			Placement and retention in postsecondary education or advanced training, military service, or qualified apprenticeships	Placement in, retention in, or completion of postsecondary education, training	**Placement in, retention in, and completion of postsecondary education or advanced training; placement in military service; attainment of a postsecondary degree or credential**
Nontraditional Employment					**Student participation in and completion of vocational and technical education programs that lead to nontraditional training and employment**

ADDITIONAL PERFORMANCE MEASURES

Performance Indicator	*WIA Title I Subtitle B (Youth and Adult)*	*WIA Title II – Adult Education*	*Perkins Voc Ed*
Customer Satisfaction	Customer satisfaction of employers and participants with services received from the workforce investment activities authorized under Subtitle B of Title I of WIA		

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